

DDA TRANSPORT STANDARD REVIEW

Submission by Max Murray
An Individual With A Mobility Disability
July 2007

1. Introduction

This submission replaces the material presented at the consultation in Townsville on 31 July 2007.

The submission reports on my experiences of public transport as a person who must use a wheelchair. The report gives my views on the DDA Transport Standard as a document. My comments are based on experiences of myself and my friends with disabilities. I hope to indicate good experiences, difficult experiences and where possible indicate possible solutions to overcome difficulties.

The submission will be presented in three parts, namely, the document, my experiences and will conclude with general comments.

2. The Transport Standard

The DDA Transport Standard has had a positive effect on new transport premises, new infrastructure buildings, and new conveyances enhancing access by people of tall stature such as myself. As my stature approximates the 95th percentile dimension for the stature of Australian males, I have great difficulty with accessing most existing buildings.

The requirement of the DDA Transport Standard for all new public buildings associated with the transport industry to meet the needs of 90% of the Australian population by 2032 will be a major factor improving my ability to access public transport and travel. Although early in the time-frame, the benefits are being felt. This is a major achievement for the DDA Transport Standard.

Achievement: The DDA Transport Standard has had a positive effect on access to transport infrastructure, enhancing the ability to travel by people of tall stature such as myself.

The provision of a staged time-frame for upgrade of existing public transport infrastructure will cause this positive effect to cascade throughout all public transport infrastructure removing existing barriers to my ability to access public transport. The staged time-frame for upgrade of transport infrastructure also spreads any cost burden of compliance. This is also a major on-going achievement for the DDA Transport Standard.

Achievement: The staged time-frame for upgrade of transport infrastructure will continue to have a positive effect on access to public transport while spreading any cost burden of compliance.

The DDA Transport Standard Part 1, Division 1.1, Section 1.6 references several Australian Standards for providing access to public transport. However, in the main, the DDA Transport Standard relies on AS1428 Part 2-1992 for provisions governing new building work associated with public transport buildings. This is a major strength of the Transport Standard.

Achievement: By referencing AS1428-2-1992 for provisions governing new transport infrastructure access to the transport infrastructure is improving.

The reliance on AS1428 Part 2-1992 for the dimensioning of new building work associated with public transport buildings has been a major strength of the DDA Transport Standard. AS1428-1-

1993, and indeed AS1428-1-2001, does not provide for the needs of some 20% of people with mobility impairment.

Recommendation 1: It is recommended that the DDA Transport Standard continue to reference Australian Standard, AS1428-2-1992 until AS1428 Part 1 has been upgraded to include all the requirements of AS1428 Part 2-1992.

Recommendation 2: It is also recommended that if any review of AS1428 Part 1 does not include all the requirements of AS1428 Part 2-1992, then the DDA Transport Standard continue to reference the requirements in AS1428 Part 2-1992.

While I have not had personal experience of a bus in which the access path was restricted to 750mm due to the wheel arch protrusion, Section 2.7, access could be limited if insufficient approach space was available to permit travel through the narrowed passage. Requirements of Part 2 and Part 3 of the Transport Standard are insufficient with regard to circulation spaces providing access to narrow openings. Although Section 3.3 refers to assistance when circulation space is limiting, there does not appear to be a requirement for sufficient circulation space to be provided to permit access through narrow passageways, either with or without assistance. Such requirement should be added to Part 3 of the Transport Standard.

However it must be noted that a mobility aid does not become smaller because assistance is provided. In fact the space required for assisted access must consider the additional space required to accommodate the assistant. Guidance regarding the minimum circulation space required might be found through AS1428-2-1992 Clause 11 and AS1428-1-1993 Clause 7. Guidance provided by Section 12.2 is considered insufficient guidance for situations described in Section 2.7.

Recommendation 3: It is recommended that a new clause be added to Part 3 requiring sufficient circulation space to be provided at the approach to a narrow passageway within a conveyance to permit assisted access.

On a significant number of occasions, I have experienced considerable difficulty with ramps used for public transport access based on AS3856 Part 1-1991. Ramps that exceed 1 in 14 are not independently accessible by 90% of people who use mobility aids. Ramps that exceed 1 in 8 are not safe. Steep ramps are not safe for most people and particularly people with disabilities. There are numerous reports of people who use wheelchairs having overbalanced on steep ramps (some with serious consequences). I have myself been tipped off a steep ramp for entry to a conveyance. Steep ramps are not safe for transport personnel providing assistance for a person needing to access the conveyance. Although I approach the 95th percentile for stature, I am within the normal range for body mass index. Yet on several occasions taxi drivers have not been capable of assisting me up a steep ramp into their vehicle.

Although AS3856-1-1998 has recently been reviewed, the reviewed Australian Standard (AS3856-1-1998) still permits the maximum grade for a ramp into a conveyance to exceed 1 in 14. While AS1428-1-2001 permits short ramps (1520mm maximum length) at 1 in 8, this can be a dangerous grade for a person expending maximum effort to negotiate the ramp.

It is acknowledged that there will be some circumstances which may necessarily prevent a normally compliant ramp from meeting the 1 in 14 maximum grade, such as when taxis or buses must provide pick-up on steeply sloping sites. However, the boarding ramp for use with taxis and buses should be designed so that the grade will not exceed 1 in 14 in 80% of anticipatable circumstances. It is recommended that a sub-clause to this effect be added to Section 6.4.

Recommendation 4: It is recommended that the reviewed DDA Transport Standard require boarding ramps used to provide unassisted access to a land-based conveyance not to exceed 1 in 14 in 80% of anticipatable circumstances.

It is also acknowledged that it is very difficult for a driver to accurately estimate if a deployed ramp has exceeded the 1 in 14 limit or not. Part 8 provides the requirements for requesting a boarding device to be deployed, however there does not appear to be facility for notifying the driver that assistance is required. It is recommended that in addition to the guidance provided in Part 33, that a Section be added to Part 8 describing requirements for a means by which an intending passenger can request assistance as well as deployment of a boarding device.

Recommendation 5: It is recommended that a Section be added to Part 8 describing requirements for a means by which an intending passenger can request assistance as well as deployment of a boarding device.

Recommendation 6: It is recommended that the reviewed DDA Transport Standard clearly require the service provider to provide the necessary assistance to all people requiring or requesting assistance to access a conveyance via an external ramp.

Recommendation 7: It is recommended that the DDA Transport Standard add a note to Section 6.4 on the necessity of the service provider to draw the driver's attention to the danger of ramps and need to provide assistance.

Similarly ramps providing access to public water transport vessels should be compliant for 80% of tides experienced at the site.

Part 6, Section 6.5 is difficult to interpret, e.g. does it mean compliant access is required for 80% of all tides or only 80% of high tides and 80% of low tides which could mean only for 60% of all tides. It is recommended that Section 6.5 be reviewed to clarify this ambiguity.

Part 6, Section 6.5 of the DDA Transport Standard should be reviewed to remove all reference to high tide levels. Restricting non-compliance to 20% of low tides only would ensure that ramps to pontoons (or vessels) provide independent access for 80% of all tides. Areas with extreme fluctuations in tidal flow should be identified for special consideration by the DDA Transport Standard in the same manner as Australia is divided into zones for energy efficient development purposes. These maps should be added to the Transport Standard as an Appendix.

Recommendation 8: It is recommended that Part 6, Section 6.5 of the DDA Transport Standard be reviewed to remove all reference to high tide levels, there-by restricting non-compliance to 20% of low tides only to ensure independent access to water-based conveyances for 80% of all tides.

Recommendation 9: It is recommended that maps be developed for Australia identifying coastal regions with extreme fluctuations in tidal flow for special consideration by the DDA Transport Standard.

Anthropometric studies show that Australians are increasing in stature. The minimum allocated floor space for a wheelchair at 800 x 1300 mm, Section 9.1, is now only just adequate. The minimum head room above the allocated space of 1410 mm, Section 9.3(1), is no longer adequate for all 90% of Australians who use wheelchairs. The need for increased head room within the conveyance is urgent. If feasible and if not negated by the requirements of Section 32.2, the increase in head room to 1500 mm, Section 9.3(2), intended for 2013 should be brought forward to 2007.

Recommendation 10: It is recommended that if feasible and if not negated by the requirements of Section 32.2, the minimum head room above an allocated space in all new conveyances be increased to 1500mm from the time of adoption of this review.

It is of major concern that restraints be provided at allocated spaces to prevent movement of mobility aids during transport, Section 9.11. This is a major safety feature and one that is not always complied with. This is due in part to the time it takes to apply effective restraints and partly because effective, rapid deployment restraints are not readily available for some forms of conveyance, e.g. buses, trains and ferries.

Recommendation 11: It is recommended that the review highlight the need for further research to develop effective, rapid deployment restraints for all types of conveyance.

Grab rails at allocated spaces, Section 11.7, are of great assistance for positioning a mobility aid. However, provision of a grab rail cannot be considered effective restraint. It would assist compliance with Section 9.11 if a note was provided in Section 11.7 stating that compliance with Section 11.7 does not equate to compliance with Section 9.11.

Recommendation 12: It is recommended that a note be provided to Section 11.7 stating that compliance with Section 11.7 does not obviate the need to provide effective restraints under Section 9.11.

Although the referencing of AS1428-2-1992 is a major strength of the Transport Standard, the inclusion of significant exceptions will severely reduce its ability to create real access to public transport. It is not clear why Section 12.2 excludes the need for transport premises to comply with Clause 11.5.2 of AS1428-2-1992. This almost completely negates the advantage of referencing AS1428-2-1992.

The anthropometric data used in the AS1428 suite of Australian Standards was obtained by research in the early 1980's. Based on this data, AS1428-2-1992 describes the space required for a stationary occupied wheelchair intended to accommodate a person using an A90 wheelchair (i.e. will accommodate 90% of people using wheelchairs). AS1428-1-2001 gives the same criteria for the space required for a stationary occupied wheelchair yet all other requirements of AS1428-1-2001 sets out access parameters required by a person using an A80 wheelchair. The size of A80 wheelchair is given in the Supplement to AS1428-1. It is considerably smaller than the A90 wheelchair catered for in AS1428-2-1992.

Recent anthropometric studies show that Australians are increasing in stature. The minimum allocated floor space for a wheelchair at 800 x 1300 mm, AS1428-2-1992, is now only just adequate. Any reduction in the requirements for circulation at doorways from that required by Clause 11.5.2 of AS1428-2-1992 will severely reduce access to transport premises by those people that do not fit within the anthropometric measurements for 90% of people who use wheelchairs. The provisions of Clause 11.5.2 of AS1428-2-1998 must be a requirement for transport premises or the inaccessible buildings being built in Australia to day will continue to be built into the future. It is strongly recommended that Section 12.2 refer to all of Clause 11 of AS1428-2-1992 in regard to transport premises.

Recommendation 13: It is strongly recommended that the exception of Clause 11.5.2, AS1428-2-1992 be removed from Section 12.2 in regard to transport premises.

The minimum vertical clearance at doorways of 1400mm, Section 12.5(1), is no longer adequate for all 90% of Australians who use wheelchairs. Current requirements can present a very dangerous situation for people of tall stature. The need for increased vertical height of doorways is urgent. If

feasible and if not negated by the requirements of Section 32.2, the intended increase in clear height of doorways to 1500mm, Section 12.5(2), should be brought forward from 2013 to the 2007 review.

Recommendation 14: It is recommended that if feasible and if not negated by the requirements of Section 32.2, the minimum vertical clearance at doorways in all new conveyances be increased to 1500mm from the time of adoption of this review.

Although the Transport Standard has a requirement for the minimum width of the accessway along the direct path of travel from the entry door to the allocated space, namely 850mm (Section 2.6(1)) or 800mm (Section 2.6(3)), the Transport Standard is silent on minimum head height required between the point of entry to a conveyance and the allocated space. Obviously, the required minimum head height (1500mm) should be provided along all of the direct path of travel from the entry door to the allocated space. This requirement should be added to the Transport Standard.

Recommendation 15: It is recommended that a new clause be added to Section 12 of the Transport Standard to require a minimum head height of 1500mm along the direct path of travel from the entry door to the allocated space.

There is now much evidence that the luminance contrasting strip of colour applied to the nosing of stair treads must not extend down the face of the riser for any distance. Although recommended by AS1428-2-1992 Clause 13.3, Figure 8, extending the colour contrasting strip down the riser can result in serious trips and falls and should be discontinued. Although not yet released, committee drafts of the Australian Standard on access and mobility have removed the requirement to continue the contrasting strip down the riser. It is recommended that the review of the Transport Standard add a note to Section 14.2(c) and to Section 14.3(b) stating that the strip of contrasting colour not extend over and down the riser.

Recommendation 16: It is recommended that a note be added to Section 14.2(c) stating that the strip of contrasting colour not extend over and down the riser.

Recommendation 17: It is recommended that a note be added to Section 14.3(b) stating that the strip of contrasting colour not extend over and down the riser.

Part 17 deals with signage. While the requirements for height of text and symbols plus illumination of signs in premises and infrastructure is provided in Section 17.1, these Sections refer only to visible signs. These sections call up AS1428-2-1992 Figure 30 which requires signage to be between 1400mm and 1600mm above the finished pedestrian surface. This height would be a convenient height for signage which includes raised tactile text and symbols plus Braille to assist people with vision loss.

Requirements for signage providing information on the destination of the conveyance are presented by Section 17.4 and by Section 17.5. This information is accessible for all people without vision loss. Requirements for signage which is accessible for people with vision loss are given in Section 17.6 which describes raised tactile and Braille signs.

The location of signs in transport premises and infrastructure is covered in Section 17.2 which calls up AS1428-2-1992 Clause 17.4. This Clause requires signs in situations where they can be temporarily obscured to be located not less than 2000mm above the pedestrian surface. Transport premises are such locations. It would not be possible for a person with vision loss to locate raised tactile or Braille signs placed at this height. Such information must also be provided audibly however there is no guidance to require the same information to be provided in an audible manner. It is recommended that Section 17.1 include a sub-clause requiring all information to be presented in both visible and audible format.

Recommendation 18: It is recommended that a Sub-Clause be added to Section 171 requiring all signage information to be provided in visible and audible format.

Section 17.4 refers to the requirement for signage to indicate destination of the conveyance. There is no indication of how intermediate stops are to be identified. It is recommended that Section 17.4 also indicate how intermediate stops are to be identified.

Recommendation 19: It is recommended that Section 17.4 include a sub-clause indicating how approaching intermediate stops are to be identified within the conveyance.

Although Part 17 presents the requirements for signage it is not until Part 26 and Part 27 that requirements for public address systems and on-board audible announcements are presented. The presentation of like requirements in widely separated locations throughout the Transport Standard makes the document difficult to use. This could lead to misinterpretation and non-compliance. It is recommended that the Transport Standard be redrafted at the time of the review.

Recommendation 20: It is recommended that the Transport Standard be redrafted to locate like information together in the document.

The DDA Transport Standard, Part 18, also references AS1428 Part 2-1992 for the locations at which tactile ground surface indicators (TGSI) are to be provided for the orientation of people with vision loss. TGSI are useful way-finding guides for this purpose and do not inhibit the use of the environment by others if limited in their use and are applied only to non-sloping surfaces. TGSI applied to the sloping surface of ramps (particularly kerb ramps) present a major hazard to people who use mobility aids. The provisions for application of TGSI along paths of travel have been reviewed and are published in AS1428-4-2002. This upgrade of the Australian Standard is, in the most part a significant improvement over AS1428-4-1992. Unfortunately, the requirements of AS1428-4-2002 still permit the application of TGSI on the slope of kerb ramps. This provision creates a safety hazard and was introduced without the agreement of people who must rely on mobility aids to access transport buildings and infrastructure.

Recommendation 21: It is recommended that the reviewed DDA Transport Standard reference AS1428-4-2002, but with the stated exclusion of the use of TGSI on any sloping path (i.e. ramps, step ramps, kerb ramps).

Requirements for carriage of belongings are presented in Part 30. I have on occasions, experienced difficulty with service providers who were not prepared to guarantee the carriage of my belongings on the same conveyance as myself. As these belongings are essential to my ability to access my lodgings and the environment in general there is a need for the addition of a requirement to Part 30. It is recommended that a Sub-Section be added to Section 30.1 to require service providers to carry the passenger's baggage on the same conveyance as the passenger and their carer.

Recommendation 22: It is recommended that a Sub-Section be added to Section 30.1 to require service providers to carry a passenger's baggage on the same conveyance as the passenger and their carer.

3. My Experience

3.1. Taxis

I am of tall stature and of a height that falls very close to that of the 95th percentile value for Australian males. I am self-employed and very active in various national committees. I travel interstate several times each year. I use taxis frequently, aircraft frequently, buses occasionally, water ferries occasionally, trains seldom but generally not trams.

I have found taxi services to vary greatly around Australia. In some State capital cities, it is still not possible to obtain a reliable service. In other capital cities, it is possible to obtain an accessible taxi on demand. In some cities it is not easy to obtain a taxi for a short ride, e.g. a couple of blocks up hill, whereas in the same city it is easy to get a long ride, e.g. from the CBD to the airport.

It is quite difficult to make several business appointments in a day when the service is unreliable.

In my limited experience, I have found that in the smaller regional cities service providers are generally trying to give a reasonable service. However, it is in the smaller towns in sparsely populated areas that accessible taxi services are lacking. On the few occasions that I have to visit these areas, I take my own vehicle (and driver).

Taxis fitted with steep ramps have caused me great pain. Although assistance is always available, some drivers are physically unable to push me up the ramp. On one occasion, a female driver tipped me off the side of the ramp. In these situations, the driver must locate another person to assist. This cannot be good OH&S practice. A reduction in permissible ramp grade must be encouraged.

Because of my stature, I have difficulty entering a vehicle with the minimum vertical clearance at the doorway. I have had some frightening experiences with vehicles such as the new Lime Taxis. Because my head hits the door frame, I get injured when assisted by a driver who insists on pushing the wheelchair when I am pressed against the vehicle. The sooner the requirement for the minimum vertical clearance at doorways to be 1500mm is introduced, the better for me.

As with vertical clearance of doorways, many taxis in service today have insufficient headroom within the accessible space for safe comfortable travel. If it is necessary for me to have to reject the vehicle that is sent by the central booking office, it can add another hour of waiting time to the journey. Such time can be critical if I am travelling to catch a flight to another city.

The outfitting of taxi vehicles with seatbelts and wheelchair restraints is generally very good.

The skill and attitude of the drivers varies greatly but generally falls into two groupings. Those drivers who have been driving accessible taxis for several years will take more care with boarding and restraining the wheelchair. These drivers will always provide a seat belt for personal restraint. Drivers who are new to the task are less dedicated to the task and take less care with boarding and restraining the wheelchair. I often have to request the vehicle seatbelt. Driver training therefore is very important when it comes to driving an accessible taxi. The Transport Standard could be more demanding in this area.

Recommendation 23: It is recommended that a Section be added to the Transport Standard requiring drivers to undergo adequate training on handling passengers with disabilities, and how to drive to ensure the safety of the wheelchair occupant.

The Transport Standard should encourage all manufacturers of wheelchairs and scooters to provide tie-down points on all such mobility aids sold in Australia.

3.2. Busses and Coaches

My experience with buses and coaches is limited. Because of the difficulty I have moving from a bus set-down point to where I wish to go, I generally do not use buses. On most occasions when I have used buses, I have found boarding facilities to be adequate with assistance. A friend capsized backwards when trying to board independently via a steep ramp. The driver claimed not to be required to provide assistance. This situation has been corrected through training of the service

provider and the drivers plus the local authority making adjustments to the boarding area to reduce the height of the climb to the bus entry.

Access to the allocated space and the size of the allocated space have always been adequate.

By far the biggest lack results from a lack of suitable restraint for either the wheelchair or the wheelchair occupant. Wheelchairs behave like parcels on the floor of a bus. If the vehicle brakes rapidly or turns quickly, the wheelchair will tend to move, often dangerously. I have often shifted across the corridor although my assistant has tried to restrain the wheelchair. A friend has fallen out of the wheelchair and is now discouraged from using buses.

There are two ways to improve this situation. The need for better training of drivers is obvious. The Transport Standard could be more demanding in this area. The other need for improvement is the development of wheelchair restraints which are safe, effective and quick to apply. The Transport Standard must require the provision of safe, effective and rapidly applied restraints for passengers who use wheelchairs.

My experience with intercity coaches, although limited, has been all good. All vehicles had hoists to assist boarding. All vehicles had tie-down restraints for the wheelchair but not seatbelts for the passenger. The drivers certainly took more care with passenger comfort than drivers of intra-city buses. I attribute the satisfaction with these experiences to the provision of effective restraints. The Transport Standard must ensure that safe, effective, rapidly applied restraints be required in all intercity coaches.

3.3. Trains

My experience with train travel as a user of a wheelchair is limited. Accessible suburban trains are becoming more available. Suburban trains are generally enjoyable however the number of accessible stations is still limited in most States. While I have not travelled by inter-city train overnight, I have made daylight trips on these trains. I travelled while seated in my wheelchair, and although not restrained, and generally was a great experience and an efficient means of travel. However, on one occasion the “accessible” train carriage had an entrance door between the carriage foyer and the seating cabin was too narrow to allow passage of my wheelchair. I travelled in the foyer. It is critical that the Transport Standard ensure that all access doorways on accessible trains be a minimum of 800mm.

3.4. Ferries

My experiences with accessible water ferries have all been positive. However, boarding gangways have not always been appropriate for the locations where they are provided. My experience is restricted to areas where maximum tidal variations are limited to four metres. There is no reason why this variation should cause difficulty in providing access to the conveyance during all tides. Service providers are trying to correct boarding difficulties at all sites I have experienced.

3.5. Aircraft

For a person with a stature of 1930mm, there are no seats in economy class on any aircraft accepting public passenger that provide sufficient space for knees. This is particularly important for a person unable to feel when dangerous pressure is applied to the knees and unable to move to assist circulation. Therefore, people who can afford to do so, are forced to travel by business class. However not all airlines offer business class. This means that for people of tall stature, air travel is either inaccessible or unaffordable.

Airlines vary greatly in requirements for booking and travel.

Many people with disabilities take much longer than non-disabled people to prepare for travel. Further because of the vagaries of public transport, people with disabilities cannot always predict how long it will take to travel to the airport. For the people who take extensive time to prepare and to travel to the airport, and wishing to travel by any airline that closes its seat allocation counters well before the departure time, it will be necessary to travel later in the day to guarantee being on time for their flight.

Airlines also vary greatly in the conditions placed on carrying mobility aids. Although the different airlines fly the same model of aircraft, some airlines claim to be unable to fit a wheelchair in the luggage locker whereas the opposition airline will carry the wheelchair. It is not clear why this requirement is imposed.

4. Concluding Remarks

I found the DDA Standards for Accessible Public Transport very difficult to read and interpret. Most of the confusion arises from trying to apply each requirement to either or all conveyances, premises or infrastructure. This results in related requirements being widely separated in the document. It is recommended that consideration be given to redrafting the Transport Standard to separate requirements for premises, infrastructure and conveyances. While this might lead to some repetition of like requirements, it will remove much of the confusion. It will also facilitate the collocation of like regulations.

Confusion with the Transport Standard results in part from the definitions in Division 1.2, in particular Section 1.8, Infrastructure and Section 1.21, Premises. The Transport Standard would benefit from a redefinition of Infrastructure and of Premises. The definition of Premises can be made quite clear by referring to all buildings associated with providing a public transport service. It would assist if Infrastructure as redefined to refer only to the equipment and other apparatus provided to facilitate the embarking and disembarking of passengers into and from conveyances.

Such redefinition would assist in any redrafting of the Transport Standard. Redefinition of premises and infrastructure is suggested because most exceptions to the requirements of accepted Australian Standards refer to infrastructure and conveyances. Such redrafting would lead to transport premises which do meet the needs of 90% of Australians who use wheelchairs.

As the first Disability Discrimination Act Standard to be adopted, the Transport Standard is a pioneer. Section 33.7 is a major strength of the document. Service providers require certainty from regulations and this Section goes a long way to spelling out the limits to their responsibility. This Section must be retained.

Achievement: A strength of the Transport Standard lies in the provision of a Section outlining the bounds of unjustifiable hardship.

During recent consultations some service providers stated that they had met their responsibilities for provision, but despite advertising, were not receiving patronage of their service. When questioned further, it became clear that they were offering tour services from a centre which was deficient of complementary services such as accessible accommodation and accessible taxis. Further, the venues being visited were not accessible. This means that people are unable to access their service and unable to enjoy the experiences being offered.

This highlights the need for accessible services to grow concurrently. Therefore the need to introduce the DDA Standard on Access to Premises as a matter of urgency should be highlighted by this review. It is recommended that the review of the Transport Standard bring attention to this matter.

Recommendation 24: It is recommended that the review of the Transport Standard bring attention to the need for the DDA Standard on Access to Premises to be adopted as a matter of urgency.

Also highlighted by the situation outlined above is glaring lack of intention by the list of proposed DDA Standards is a Standard on access to outdoor venues and tourism sites. The situation experienced by tour operators will not change until a DDA Standard is drafted for outdoor access. It is not clear if the current DDA provides for such a Standard on Outdoor Access, but the Transport Standard review should highlight the need. If the current DDA does not provide for a Standard on Outdoor Access, it should be amended to facilitate the introduction of such a Standard. The Transport Standard review should address this co-requirement.

Recommendation 25: It is recommended that the review of the Transport Standard bring attention to the need for the DDA Standard on Outdoor Access to be drafted and adopted as a matter of urgency.

5. Summary

The following lists my perception of the achievements of the Transport Standard and my recommendations for improvement.

5.1. Achievements

Achievement: The DDA Transport Standard has had a positive effect on access to transport infrastructure, enhancing the ability to travel by people of tall stature such as myself.

Achievement: The staged time-frame for upgrade of transport infrastructure will continue to have a positive effect on access to public transport while spreading any cost burden of compliance.

Achievement: By referencing AS1428-2-1992 for provisions governing new transport infrastructure access to the transport infrastructure is improving.

Achievement: A strength of the Transport Standard lies in the provision of a Section outlining the bounds of unjustifiable hardship.

5.2. Recommendations

Recommendation 1: It is recommended that the DDA Transport Standard continue to reference Australian Standard, AS1428-2-1992 until AS1428 Part 1 has been upgraded to include all the requirements of AS1428 Part 2-1992.

Recommendation 2: It is also recommended that if any review of AS1428 Part 1 does not include all the requirements of AS1428 Part 2-1992, then the DDA Transport Standard continue to reference the requirements in AS1428 Part 2-1992.

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Recommendation 10: It is recommended that if feasible and if not negated by the requirements of Section 32.2, the minimum head room above an allocated space in all new conveyances be increased to 1500mm from the time of adoption of this review.

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Recommendation 14: It is recommended that if feasible and if not negated by the requirements of Section 32.2, the minimum vertical clearance at doorways in all new conveyances be increased to 1500mm from the time of adoption of this review.

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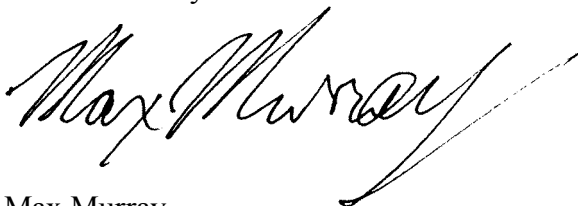
Recommendation 23: It is recommended that a Section be added to the Transport Standard requiring drivers to undergo adequate training on handling passengers with disabilities, and how to drive to ensure the safety of the wheelchair occupant.

Recommendation 24: It is recommended that the review of the Transport Standard bring attention to the need for the DDA Standard on Access to Premises to be adopted as a matter of urgency.

Recommendation 25: It is recommended that the review of the Transport Standard bring attention to the need for the DDA Standard on Outdoor Access to be drafted and adopted as a matter of urgency.

Thank you for accepting this submission. Should it be necessary to contact me regarding this submission, I may be contacted by email on accessdesigns@bigpond.com or by phone on (07) 4728 9831.

Yours sincerely

A handwritten signature in black ink that reads "Max Murray". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Max Murray.